

EXHIBIT 7

In the Matter of:
Emmanuel Thiersaint vs
Department of Homeland Security, et al

Zezhina Mitchell

October 05, 2020

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Emmanuel Thiersaint vs
Department of Homeland Security, et al

Zezhina Mitchell
October 05, 2020

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

EMMANUEL THIERSAINT,
Plaintiff,

vs.

Civil Action No.
1:18-cv-12406-PBS

DEPARTMENT OF HOMELAND SECURITY;
U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT; WILLIAM CHAMBERS,
in his individual capacity;
JOHN DOE DEFENDANTS 1-10, unknown
ICE Agents, in their individual
capacities; SUFFOLK COUNTY
SHERIFF'S DEPARTMENT; JOHN DOE
DEFENDANTS 11-16, unknown
officers of the Suffolk County
Sheriff's Department, in their
individual capacities; and
UNITED STATES OF AMERICA,

Defendants.

DEPOSITION OF ZEZHINA MITCHELL

Conducted Remotely

20 Bradston Street

Boston, Massachusetts

Monday, October 5, 2020, 8:05 a.m.

Reporter: James A. Scally, RMR, CRR

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A P P E A R A N C E S

WOLF, GREENFIELD & SACKS PC
600 Atlantic Avenue
Boston, Massachusetts 02210
617-720-3500

By: Kevin R. Mosier, Esq.
Anant K. Saraswat, Esq.
Counsel for the Plaintiff

UNITED STATES DEPARTMENT OF JUSTICE
UNITED STATES ATTORNEY'S OFFICE
1 Courthouse Way
Suite 9200
Boston, Massachusetts 02210
617-748-3100

By: Eve A. Piemonte, Esq.
Counsel for the Defendant United
States of America, et al.

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A P P E A R A N C E S

SUFFOLK COUNTY SHERIFF'S DEPARTMENT

200 Nashua Street

Boston, Massachusetts 02114

617-704-6680

By: Melissa J. Garand, Esq.

Counsel for the Defendant Suffolk

County Sheriff's Department

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I N D E X

WITNESS

EXAMINATION

ZEZHINA MITCHELL

(By Mr. Mosier)

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E X H I B I T S

NO.

PAGE

Exhibit 1 Job description Bates stamped
SCSD000298 through 300

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Exhibit 2 PowerPoint presentation Bates
stamped SCSD003611 through
3657

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Exhibit 3 Grievance form Bates stamped
SCSD003773 through 3776

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Exhibit 4 Grievance form Bates stamped
SCSD003674

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(Exhibits were given to the court
reporter to attach to the transcript.)

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1 THE COURT REPORTER: This is James
2 A. Scally. I am a Registered Merit
3 Reporter, Certified Realtime Reporter,
4 and I am a Notary Public in the
5 Commonwealth of Massachusetts.

6 This deposition is being taken
7 remotely. This witness is appearing
8 remotely from 20 Bradston Street,
9 Boston, Massachusetts.

10 The attorneys participating in
11 this proceeding acknowledge their
12 understanding that I am not physically
13 present in the proceeding room, nor am
14 I physically present with the witness
15 and that I will be reporting this
16 proceeding remotely. They further
17 acknowledge that, in lieu of an oath
18 administered in person, the witness
19 will verbally declare her testimony in
20 this matter under the pains and
21 penalties of perjury. The parties and
22 their counsel consent to this
23 arrangement and waive any objections to
24 this manner of proceeding.

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Please indicate your agreement by
stating your name and your agreement on
the record, after which I will swear in
the witness and we may begin.

MS. GARAND: This is Melissa
Garand, and I agree to your statement.

MR. MOSIER: This is Kevin Mosier,
and I agree to your statement.

MS. PIEMONTE: This is Eve
Piemonte. I agree.

MR. SARASWAT: And this is Anant
Saraswat. I agree.

ZEZHINA MITCHELL, having been
satisfactorily identified by the
production of her driver's license and
duly sworn by the Notary Public, was
examined and testified as follows in
answer to direct interrogatories:

EXAMINATION

BY MR. MOSIER:

Q. All right. Good morning, Ms. Mitchell.
Thank you for being here. My name is Kevin Mosier,

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1 Superintendent Richard McCarthy is part of that team.
2 I would assume that -- and this is just an
3 assumption -- ADS Rachelle Steinberg.

4 Q. Okay. And, to your knowledge, would a
5 physician be a part of the team reviewing such a
6 request?

7 A. I am not aware of that.

8 Q. Okay. To your knowledge, did Mr. Thiersaint
9 ever make a request for accommodations?

10 MS. GARAND: Objection.

11 A. He did not fill out a grievance.

12 Q. So, to your knowledge, Mr. Thiersaint never
13 filled out a grievance?

14 A. Correct.

15 Q. But you do not know whether or not Mr.
16 Thiersaint made some type of request to someone
17 asking for accommodations under the ADA?

18 A. I do not know.

19 Q. Now, stepping back to discuss ICE detainees
20 generally, we established that ICE detainees in 2016
21 were housed in a dedicated building, which was
22 Building 8; correct?

23 A. Correct.

24 Q. And, to your knowledge, ICE detainees were